

FILED

OCT - 3 2019

U.S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

4:19CR00821 RLW/NCC

v.

No.

CHARLES EDWARD KATES, SR.,

Defendant.

REQUEST FOR PRE-TRIAL DETENTION AND HEARING

Comes now the United States of America, by and through its Attorneys, Jeffrey B. Jensen, United States Attorney for the Eastern District of Missouri, and Jason Dunkel, Assistant United States Attorneys for said District, and moves the Court to order Defendant detained pending trial, and further requests that a detention hearing be held three (3) days from the date of Defendant's initial appearance before the United States Magistrate pursuant to Title 18, United States Code, Section 3141, et seq.

As and for its grounds, the United States of America states as follows:

1. Defendant is charged with two counts of being a felon in possession of a firearm, in violation of Title 18, United States Code, Section 922.
2. Multiple guns have been seized from the Defendant in relation to multiple incidents. On April 13, 2019, the Defendant was found passed out in his vehicle with a firearm sitting on his lap. In an August 13, 2019, search of the Defendant's home, he was to have multiple weapons in his home, one of which was underneath his mattress. An additional firearm was found under the couch on which his adult son was sleeping.
3. The Defendant has a history of threatening to shoot police officers. In the August 13, 2019 incident, the Defendant admitted he previously told police "if y'all come back

to my house, I was gonna shoot the shit out of y'all."

4. Pursuant to Title 18, United States Code, Section 3142(g),
 - (a) the nature and circumstances of the offense charged;
 - (b) the weight of the evidence against defendant;
 - (c) the defendant's history and characteristics; and
 - (d) the nature and seriousness of the danger to any person or the community that would be posed by defendant's release,

warrant defendant's detention pending trial.

5. Accordingly, there are no conditions or combination of conditions which will reasonably assure the appearance of the defendant as required, and the safety of any other person and the community.

WHEREFORE, there are no conditions or combination of conditions that will reasonably assure defendant's appearance as required and the safety of any other person and the community and the Government requests this Court to order Defendant detained prior to trial, and further to order a detention hearing three (3) days from the date of Defendant's initial appearance.

Respectfully submitted,

JEFFREY B. JENSEN
United States Attorney

s/Jason S. Dunkel
JASON S. DUNKEL, #65886MO
Assistant United States Attorney